

# GT GreenbergTraurig

Richard A. Edlin  
Vice Chairman  
Tel 212.801.9200  
Fax 212.801.6400  
edlinr@gtlaw.com

## MEMO ENDORSED

January 3, 2023

### VIA EMAIL

Hon. Edgardo Ramos  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

The requests for permission to (1) redact information in Perrigo's application for a temporary restraining order and preliminary injunction, and related filings, and (2) to file under seal a related contract are granted. SO ORDERED.



Edgardo Ramos, U.S.D.J.  
Dated: January 3, 2023  
New York, New York

Re: *Perrigo Pharma Int'l Designated Activity Co. v. Mead Johnson & Co.*, No. 23-cv-00008 (ER)

Dear Judge Ramos:

We represent plaintiff Perrigo Pharma International Designated Activity Co. ("Perrigo") in the above-captioned action. We write to respectfully request permission to redact sensitive and confidential business information in Perrigo's application for a temporary restraining order and preliminary injunction and related filings, and to file under seal a single, highly negotiated contract reflecting information of the same kind, which we are filing contemporaneously herewith.<sup>1</sup> Because an explanation of the reasons Perrigo seeks redaction and sealing would reveal the very sensitive and confidential information that Perrigo seeks to protect, Perrigo is contemporaneously emailing to Chambers a letter setting forth in detail the bases for the proposed redaction and sealing. *See* Individual Rules of Practice of Judge Edgardo Ramos 1(A).

Respectfully submitted,

/s/ Richard A. Edlin

Richard A. Edlin

<sup>1</sup> In particular, Perrigo seeks (i) to redact sensitive and confidential business information from the Memorandum of Law in Support of Plaintiff's Application for a Temporary Restraining Order and Preliminary Injunction ("TRO Memorandum" or "TRO Mem."), the Joint Declaration of Toby Bedell, Chris Kapral and Ron Janish in Support of Perrigo's Order to Show Cause for Temporary Restraining Order and Preliminary Injunction (the "Joint Declaration" or "Joint Decl."), and communications between Perrigo and Mead Johnson filed as Exhibits 2, 3, and 5 of the Joint Declaration; and (ii) to seal the Agreement at the heart of this case, filed as Exhibit 1 to the Joint Declaration.